

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
ENTERTAINMENT MEDIA TRUST,	)	MB Docket No. 19-156
DENNIS J. WATKINS, TRUSTEE	)	
	)	
Applications to Renew License:	)	
	)	
KFTK(AM) (formerly WQQX(AM)), East St.	)	Facility ID No. 72815
Louis, Illinois	)	File No: BR-20120709ACP
	)	
WQQW(AM), Highland, Illinois	)	Facility ID No. 90598
	)	File No. BR-20120709AC0
	)	
KZQZ(AM), St. Louis, Missouri	)	Facility ID No. 72391
	)	File No. BR-20120921AAW
	)	
KQQZ(AM), DeSoto, Missouri	)	Facility ID No. 5281
	)	File No. BR-20120921ABA
	)	
Application for Consent to Assignment of	)	
Licenses:	)	
	)	
KFTK(AM) (formerly WQQX(AM)), East St.	)	Facility ID No. 72815
Louis, Illinois	)	File No: BAL-20160919ADH
	)	
WQQW(AM), Highland, Illinois	)	Facility ID No. 90598
	)	File No. BAL-20160919ADI
	)	
KZQZ(AM), St. Louis, Missouri	)	Facility ID No. 72391
	)	File No. BAL-20160919ADJ
	)	
KQQZ(AM), DeSoto, Missouri	)	Facility ID No. 5281
	)	File No. BAL-0160919ADK
	)	
Application for Permit to Construct New Station:	)	
	)	
W275CS, Highland, Illinois	)	Facility ID No. 200438
	)	File Nos. BNPFT-20170726AEF and
	)	BNPFT-20180314AAO
	)	

**MOTION FOR LEAVE  
TO FILE REPLY TO OPPOSITIONS**

Donald M. Samson (“Trustee”), court-appointed trustee of Entertainment Media Trust, Dennis J. Watkins, Trustee (“EMT”), hereby requests leave of the Presiding Judge to reply to the Opposition to Motion for Stay or in the Alternative Extension of Time filed by Petitioner Mark Kern on September 16, 2019 and the Enforcement Bureau’s Opposition to EMT’s Motion for Stay of Proceedings or in the Alternative Extension of Time filed on September 17, 2019 (collectively the “Oppositions”). Trustee acknowledges that the Commission’s rules do not grant replies to opposition as a matter of right, 47 C.F.R. § 1.249(b). However, the Presiding Judge has discretion to allow “any additional information it deems appropriate for a full, fair, and expeditious resolution of the proceeding.” 47 C.F.R. § 1.732(c). Trustee submits that, in light of the changes in circumstances and authority resulting from the filing by EMT of a petition for bankruptcy under Chapter 7 of the United States Bankruptcy Code and the attendant appointment of Trustee, a reply to the Oppositions is reasonable and will permit a full, fair and expeditious resolution of the instant proceeding.

Trustee enters this proceeding distinct and independent from EMT and, therefore, may be better positioned to work towards an expeditious resolution of both this proceeding and the bankruptcy proceeding. When EMT filed for Chapter 7 bankruptcy protection, a bankruptcy estate was created, and that estate is now the temporary owner of EMT’s property and assets. Trustee’s primary role in managing the estate will be to liquidate EMT’s property and assets to maximize the return to EMT’s unsecured creditors, not EMT. Because the bankruptcy trust now owns EMT’s property and assets, EMT no longer controls or has the authority to dispose of or otherwise make use of its assets without Trustee’s consent.

Trustee is swiftly undertaking all necessary actions to gain effective control over EMT

and its assets. To wit, on September 16, 2019, Trustee filed with the Commission an Application for Consent to Transfer Control of Entity Holding Broadcast Station Construction Permit or License (File No. BTC-20190916AAA), a copy of which is attached hereto at Exhibit A. Trustee is also preparing the appropriate petition to the bankruptcy court to appoint undersigned counsel as counsel to the Trustee in FCC matters relating to the EMT assets.

In the interest of both the practical realities of Trustee's appointment and the conservation of judicial and administrative resources, Trustee submits that a reply to the Oppositions would be appropriate. Trustee's reply could further clarify the status of the bankruptcy proceeding and its likely timeline and impact on this proceeding. Moreover, while Trustee has no interest in subverting the Commission's process, the reply would also detail Trustee's interest in minimizing the further diminution of the bankruptcy estate, which makes the prompt resolution of this matter a priority for the Trustee's expeditious resolution of the bankruptcy proceeding. Such additional information will allow the Presiding Judge to fully and fairly consider the interaction of this proceeding and the bankruptcy proceeding before ruling on the Oppositions.

RESPECTFULLY SUBMITTED,

\_\_\_\_\_/s/\_\_\_\_\_  
Davina Sashkin, Esq.  
Fletcher Heald & Hildreth, PLC  
1300 N. 17<sup>th</sup> Street, 11<sup>th</sup> Floor  
Arlington, VA 22209  
(703) 812-0458  
sashkin@fhhlaw.com

\_\_\_\_\_/s/\_\_\_\_\_  
Anthony Lepore, Esq.  
Radiotvlaw Associates, LLC  
4101 Albemarle Street NW #324  
Washington, DC 20016-2151  
(202) 681-2201  
anthony@radiotvlaw.net

Dated: September 17, 2019

## CERTIFICATE OF SERVICE

I, Seth Williams, hereby certify that on this 17th day of September, 2019, a copy of the foregoing Motion for Leave to Reply to Oppositions was served by email on the following:

Jeffrey Gee, Esq.  
Chief, Investigations & Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
[Jeffrey.Gee@fcc.gov](mailto:Jeffrey.Gee@fcc.gov)

Pamela Kane, Esq.  
Investigations & Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
[Pamela.Kane@fcc.gov](mailto:Pamela.Kane@fcc.gov)

Howard M. Liberman, Esq.  
Robert Kirk, Esq.  
Wilkinson Barker Knauer  
1800 M Street, N.W., Suite 800N Washington, DC 20036  
[HLiberman@wbklaw.com](mailto:HLiberman@wbklaw.com)  
[RKirk@wbklaw.com](mailto:RKirk@wbklaw.com)  
*Counsel for Mark Kern*

Courtesy copies of the foregoing were also provided by email to the following:

The Honorable Jane Hinkley-Halprin  
Office of Administrative Law Judges  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
[Jane.Halprin@fcc.gov](mailto:Jane.Halprin@fcc.gov)

John B. Adams  
Office of Administrative Law Judges  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
[JohnB.Adams@fcc.gov](mailto:JohnB.Adams@fcc.gov)

/s/ Seth L. Williams\_\_\_\_\_

## **EXHIBIT A**

Federal Communications Commission Washington, D.C. 20554  <div style="text-align: center;"><b>FCC 316</b></div>	Approved by OMB 3060-0009 (June 2010)  FOR FCC USE ONLY
<div style="text-align: center;"><b>APPLICATION FOR CONSENT TO ASSIGN BROADCAST STATION CONSTRUCTION PERMIT OR LICENSE OR TO TRANSFER CONTROL OF ENTITY HOLDING BROADCAST STATION CONSTRUCTION PERMIT OR LICENSE</b></div> <div style="text-align: center;">Read INSTRUCTIONS Before Filling Out Form</div>	FOR COMMISSION USE ONLY FILE NO. BTC - 20190916AAA

**Section I - General Information**

1. Legal Name of the Licensee/Permittee ENTERTAINMENT MEDIA TRUST, DENNIS J. WATKINS, TRUSTEE  Mailing Address 6500 WEST MAIN STREET SUITE 315  <table border="1" style="width: 100%;"> <tr> <td style="width: 33%;">City BELLEVILLE</td> <td style="width: 33%;">State or Country (if foreign address) IL</td> <td style="width: 34%;">Zip Code 62223 -</td> </tr> <tr> <td>Telephone Number (include area code) 6183949937</td> <td colspan="2">E-Mail Address (if available) INFO@KZQZ1430AM.COM</td> </tr> <tr> <td>FCC Registration Number: 0014655476</td> <td>Call Sign WQQW</td> <td>Facility ID Number 90598</td> </tr> </table>	City BELLEVILLE	State or Country (if foreign address) IL	Zip Code 62223 -	Telephone Number (include area code) 6183949937	E-Mail Address (if available) INFO@KZQZ1430AM.COM		FCC Registration Number: 0014655476	Call Sign WQQW	Facility ID Number 90598
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Telephone Number (include area code) 6183949937	E-Mail Address (if available) INFO@KZQZ1430AM.COM								
FCC Registration Number: 0014655476	Call Sign WQQW	Facility ID Number 90598							
2. Contact Representative (if other than licensee/permittee) ANTHONY T. LEPORE, ESQ.  Mailing Address 4101 ALBEMARLE ST NW #324  <table border="1" style="width: 100%;"> <tr> <td style="width: 33%;">City WASHINGTON</td> <td style="width: 33%;">State or Country (if foreign address) DC</td> <td style="width: 34%;">ZIP Code 20016 - 2151</td> </tr> <tr> <td>Telephone Number (include area code) 2026812201</td> <td colspan="2">E-Mail Address (if available) ANTHONY@RADIOTVLAW.NET</td> </tr> </table>	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20016 - 2151	Telephone Number (include area code) 2026812201	E-Mail Address (if available) ANTHONY@RADIOTVLAW.NET				
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20016 - 2151							
Telephone Number (include area code) 2026812201	E-Mail Address (if available) ANTHONY@RADIOTVLAW.NET								
3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input checked="" type="radio"/> Other CHAPTER 7 TRUSTEE <input type="radio"/> N/A (Fee Required)									
4. a. <input type="radio"/> Voluntary Assignment or Transfer of Control <input type="radio"/> Amendment to pending application File number of pending application: -  If an amendment, <b>submit as an Exhibit</b> a listing, by Section and Question Number, of the portions of the pending application that are being revised. <span style="float: right;">[Exhibit 1]</span>  b. Applicant certifies that the use of FCC Form 316 is appropriate for this transaction. <span style="float: right;"> <input checked="" type="radio"/> Yes    <input type="radio"/> No          See Explanation in          [Exhibit 2]       </span>									
5. Were any of the authorizations that are the subject of this application obtained through the Commission's competitive bidding procedures (see 47 C.F.R. Sections 1.2111(a) and 73.5000)? <span style="float: right;"> <input type="radio"/> Yes    <input checked="" type="radio"/> No          [Exhibit 3]       </span>  If yes, list pertinent authorizations in an Exhibit.									

**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.**

**Section II - Assignor/Transferor**

1.	<b>Certification.</b> Assignor/Transferor certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Assignor/Transferor further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.			<input checked="" type="radio"/> Yes <input type="radio"/> No	
2.	Application for (check one):	<input type="radio"/>	Consent to Assign Construction Permit	<input type="radio"/>	Consent to Transfer Control of Permittee
		<input type="radio"/>	Consent to Assign License	<input checked="" type="radio"/>	Consent to Transfer Control of Licensee
		<input type="radio"/>	Amendment to pending application		
3.	Legal Name of the Assignor/Transferor DENNIS J. WATKINS, TRUSTEE				
	Mailing Address 6500 WEST MAIN STREET #315				
	City BELLEVILLE	State or Country (if foreign address) IL		Zip Code 62223 -	
	Telephone Number (include area code) 6183949937			E-Mail Address (if available) INFO@KZQZ1430.COM	
4.	Contact Representative (if other than Assignor/Transferor) ANTHONY T. LEPORE, ESQ.			Firm or Company Name RADIOTVLAW ASSOCIATES, LLC	
	Mailing Address 4101 ALBEMARLE ST NW #324				
	City WASHINGTON	State or Country (if foreign address) DC		Zip Code 20016 - 2151	
	Telephone Number (include area code) 2026812201			E-Mail Address (if available) ANTHONY@RADIOTVLAW.NET	
	If more than one Transferor, submit the information requested in Questions 3 and 4 for each transferor. [Exhibit 4]				
5.	<b>Authorizations to be Assigned/Transferred.</b> List the authorized stations and construction permits to be assigned/transferred. Provide the Facility Identification Number and the Call Sign, or the Facility Identification Number and the File Number of the Construction Permit, and the location, for each station to be assigned/transferred. Include main stations, FM and/or TV translator stations, LPTV stations, FM and/or TV booster stations.  [Enter Station Information]				
	List the authorized stations and construction permits to be assigned/transferred. Provide the Facility Identification Number and the Call Sign, or the Facility Identification Number and the File Number of the Construction Permit, and the location, for each station to be assigned/transferred. Include main stations, FM and/or TV translator stations, LPTV stations,, FM and/or TV booster stations.				
	Facility ID Number	Call Sign	or Construction Permit File Number	City	State
	90598	WQQW	-	HIGHLAND	IL
	Facility ID Number	Call Sign	or Construction Permit File Number	City	State
	72391	KZQZ	-	ST LOUIS	MO
	Facility ID Number	Call Sign	or Construction Permit File Number	City	State



5281	KQQZ	-	FAIRVIEW HEIGHTS	IL
Facility ID Number	Call Sign	or Construction Permit File Number	City	State
72815	KFTK	-	EAST ST. LOUIS	IL
Facility ID Number	Call Sign	or Construction Permit File Number	City	State
200438		BNPFT- 20180314AAO	HIGHLAND	IL

  

6.	<b>Agreements for Sale/Transfer of Station.</b> a. If the transaction is voluntary, Assignor/Transferor certifies that: <ul style="list-style-type: none"> <li>i. it has placed in licensee's/permittee's public inspection file(s) and submitted as an exhibit to this item copies of all agreements for the assignment/transfer of the station(s);</li> <li>ii. these documents embody the complete and final understanding between assignor/transferor and assignee/transferee; and</li> <li>iii. these agreements comply fully with the Commission's rules and policies.</li> </ul> b. If the transaction is involuntary, the Assignor/Transferor certifies that court orders or other authorizing documents have been issued and that it has placed in the licensee's/permittee's public inspection file(s) and submitted to the Commission copies of such court orders or other authorizing documents. <b>Exhibit Required</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A [Exhibit 5]  <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A [Exhibit 6]
7.	<b>Character Issues.</b> Assignor/Transferor certifies that neither licensee/permittee nor any party to the application has or has had any interest in, or connection with: <ul style="list-style-type: none"> <li>a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or</li> <li>b. any pending broadcast application in which character issues have been raised.</li> </ul>	<input type="radio"/> Yes <input checked="" type="radio"/> No See Explanation in [Exhibit 7]
8.	<b>Adverse Findings.</b> Assignor/Transferor certifies that, with respect to the assignor/transferor and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 8]
9.	<b>Auction Authorization.</b> Assignor/transferor certifies that more than five years have passed since the issuance of the construction permit for the station being assigned, where that permit was acquired in an auction through the use of a bidding credit or other special measure.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 9]
10.	<b>Anti-Drug Abuse Act Certification.</b> Assignor/Transferor certifies that neither licensee/permittee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing DENNIS J. WATKINS	Typed or Printed Title of Person Signing TRUSTEE, ENTERTAINMENT MEDIA TRUST
Signature	Date 09/13/2019

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be**

submitted for each question for which a "No" response is provided.

### Section III - Assignee/Transferee

1.	<b>Certification.</b> Assignee/Transferee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Assignee/Transferee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No																				
2.	Legal Name of the Assignee/Transferee DONALD M. SAMSON, CHAPTER 7 TRUSTEE Mailing Address 226 WEST MAIN STREET #102 <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width: 33%;">City BELLEVILLE</td> <td style="width: 33%;">State or Country (if foreign address) IL</td> <td style="width: 34%;">Zip Code 62220 -</td> </tr> <tr> <td colspan="2">Telephone Number (include area code) 6182352226</td> <td>E-Mail Address (if available)  DNLDSAMSON@GMAIL.COM</td> </tr> </table>		City BELLEVILLE	State or Country (if foreign address) IL	Zip Code 62220 -	Telephone Number (include area code) 6182352226		E-Mail Address (if available)  DNLDSAMSON@GMAIL.COM														
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3.	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Contact Representative (if other than Assignee/Transferee)</td> <td style="width: 40%;">Firm or Company Name</td> </tr> <tr> <td colspan="2">Mailing Address</td> </tr> <tr> <td>City</td> <td>State or Country (if foreign address)</td> </tr> <tr> <td colspan="2">Zip Code</td> </tr> <tr> <td colspan="2">-</td> </tr> <tr> <td>Telephone Number (include area code)</td> <td>E-Mail Address (if available)</td> </tr> </table>		Contact Representative (if other than Assignee/Transferee)	Firm or Company Name	Mailing Address		City	State or Country (if foreign address)	Zip Code		-		Telephone Number (include area code)	E-Mail Address (if available)								
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-																						
Telephone Number (include area code)	E-Mail Address (if available)																					
If more than one Transferee, submit the information requested in Questions 2 and 3 for each transferee. <span style="float: right;">[Exhibit 10]</span>																						
4.	<b>Agreements for Sale/Transfer of Station.</b> Assignee/Transferee certifies that: a. the written agreements in the licensee/permittee's public inspection file embody the complete and final agreement for the sale or transfer of the station(s); and b. these agreements comply fully with the Commission's rules and policies.	<input type="radio"/> Yes <input checked="" type="radio"/> No [Exhibit 11]																				
5.	<b>Changes in interests as a result of assignment/transfer.</b> a. [Enter Changes in Interests Information]																					
<b>Changes in Interests as a Result of Assignment/Transfer</b>																						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th rowspan="3" style="width: 25%;">(A) NAMES AND ADDRESSES OF ANY PARTY TO APPLICATION HOLDING AN ATTRIBUTABLE INTEREST</th> <th rowspan="3" style="width: 10%;">(B) CITIZENSHIP</th> <th colspan="4" style="text-align: center;">INTEREST HELD</th> </tr> <tr> <th colspan="2" style="text-align: center;">(C) BEFORE TRANSFER OR ASSIGNMENT</th> <th colspan="2" style="text-align: center;">(D) AFTER TRANSFER OR ASSIGNMENT</th> </tr> <tr> <th style="text-align: center;">(1) Percentage Vote</th> <th style="text-align: center;">(2) PercentageTotal Assets (Equity plus Debt)</th> <th style="text-align: center;">(1) Percentage Votes</th> <th style="text-align: center;">(2) PercentageTotal Assets (Equity plus Debt)</th> </tr> <tr> <td style="padding: 5px;">DENNIS J. WATKINS, TRUSTEE, 6500 W. MAIN STREET, #315, BELLEVILLE, IL 62223</td> <td style="text-align: center; padding: 5px;">US</td> <td style="text-align: center; padding: 5px;">100</td> <td style="text-align: center; padding: 5px;">0</td> <td style="text-align: center; padding: 5px;">0</td> <td style="text-align: center; padding: 5px;">0</td> </tr> </table>			(A) NAMES AND ADDRESSES OF ANY PARTY TO APPLICATION HOLDING AN ATTRIBUTABLE INTEREST	(B) CITIZENSHIP	INTEREST HELD				(C) BEFORE TRANSFER OR ASSIGNMENT		(D) AFTER TRANSFER OR ASSIGNMENT		(1) Percentage Vote	(2) PercentageTotal Assets (Equity plus Debt)	(1) Percentage Votes	(2) PercentageTotal Assets (Equity plus Debt)	DENNIS J. WATKINS, TRUSTEE, 6500 W. MAIN STREET, #315, BELLEVILLE, IL 62223	US	100	0	0	0
(A) NAMES AND ADDRESSES OF ANY PARTY TO APPLICATION HOLDING AN ATTRIBUTABLE INTEREST	(B) CITIZENSHIP	INTEREST HELD																				
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KATRINA M. SANDERS, 6500 W. MAIN ST., #315, BELLEVILLE IL 62223	US	0	100	0	0
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(A) NAMES AND ADDRESSES OF ANY PARTY TO APPLICATION HOLDING AN ATTRIBUTABLE INTEREST	(B) CITIZENSHIP	INTEREST HELD			
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		(1) Percentage Vote	(2) Percentage Total Assets (Equity plus Debt)	(1) Percentage Votes	(2) Percentage Total Assets (Equity plus Debt)
DONALD M. SAMSON, CH 7 TRUSTEE, 226 W. MAIN ST., #102, BELLEVILLE, IL 62220	US	0	0	100	100

or [Exhibit 12]

b. Applicant certifies that equity interests not set forth above are non-attributable.

☒ Yes ☐ No

☐ N/A

[Exhibit 13]

6. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which assignee/transferee or any party to the application has an attributable interest.

☒ N/A

[Exhibit 14]

7. **Acquisition of Control.** List the file number and date of grant of FCC Form 301, 314, or 315 application by which the Commission approved the qualifications of the individual or entity with a pre-existing interest in the licensee/permittee that is now acquiring control of the licensee/permittee as a result of the grant of this application.

☒ N/A

[Exhibit 15]

8. **Character Issues.** Assignee/Transferee certifies that neither assignee/transferee nor any party to the application has or has had any interest in, or connection with:

a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or

b. any pending broadcast application in which character issues have been raised.

☒ Yes ☐ No

See Explanation in [Exhibit 16]

9. **Adverse Findings.** Assignee/Transferee certifies that, with respect to the assignee/transferee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.

☒ Yes ☐ No

See Explanation in [Exhibit 17]

10. **Alien Ownership and Control.** Assignee/Transferee certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.

☒ Yes ☐ No

See Explanation in [Exhibit 18]

11. **Auction Authorization.** Assignee/transferee certifies that where less than five years have passed since the issuance of the construction permit and the permit had been acquired in an auction through the use of a bidding credit or other special measure, it would qualify for such credit or other special measure.

☐ Yes ☐ No

☒ N/A

See Explanation in

	[Exhibit 19]
12. <b>Anti-Drug Abuse Act Certification.</b> Assignee/transferee certifies that neither licensee/permittee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing DONALD M. SAMSON	Typed or Printed Title of Person Signing CHAPTER 7 TRUSTEE
Signature	Date 09/13/2019

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

## Exhibits

### Exhibit 2

**Description:** USE OF FORM 316

THIS APPLICATION IS FOR TRANSFER OF CONTROL TO A CHAPTER 7 FEDERAL BANKRUPTCY TRUSTEE, WHICH IS A SPECIFICALLY ENUMERATED USE FOR THIS FORM.

### Attachment 2

### Exhibit 6

**Description:** INVOLUNTARY TRANSFER OF CONTROL

ATTACHED IS A COPY OF THE NOTICE OF FILING OF BANKRUPTCY CASE AS OF 9/11/2019 AND A COPY OF THE NOTICE OF COMMENCEMENT OF THE BANKRUPTCY CASE.

### Attachment 6

Description
<a href="#">NOTICE OF FILING OF BANKRUPTCY CASE CHAPTER 7 LIQUIDATION</a>
<a href="#">NOTICE OF COMMENCEMENT OF BANKRUPTCY CASE CHAPTER 7 LIQUIDATION</a>

### Exhibit 7

**Description:** CHARACTER ISSUES

THE STATIONS AND LICENSEE/ASSIGNOR ARE PARTIES TO A HEARING DESIGNATION ORDER UNDER MB DOCKET NUMBER 19-156

### Attachment 7

### Exhibit 11

**Description:** WRITTEN AGREEMENTS

THERE ARE NO WRITTEN AGREEMENTS - ASSIGNEE HAS BEEN APPOINTED CHAPTER 7 TRUSTEE BY THE BANKRUPTCY COURT IN SOUTHERN DISTRICT OF ILLINOIS TO LIQUIDATE THE ASSETS OF ASSIGNOR, INCLUDING BUT NOT LIMITED TO THE LICENSES ASSOCIATED THEREWITH, SUBJECT TO PRIOR COMMISSION CONSENT. A COPY OF THE NOTICE OF FILING AND NOTICE OF COMMENCEMENT OF THE CASE ARE ATTACHED

**Attachment 11**

Description
<a href="#">NOTICE OF FILING OF BANKRUPTCY CASE CHAPTER 7 LIQUIDATION</a>
<a href="#">NOTICE OF COMMENCEMENT OF BANKRUPTCY CASE CHAPTER 7 LIQUIDATION</a>

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